

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

TYRONE HENDERSON, SR., *et al.*,

Plaintiffs,

v.

Civil Action No. 3:20-cv-00294-REP

**THE SOURCE FOR PUBLIC
DATA, L.P., *et al.*,**

Defendants.

**DEFENDANTS' MOTION TO DISMISS
PLAINTIFFS' AMENDED COMPLAINT PURSUANT TO FED. R. CIV. P. 12(B)(6)**

Defendants, The Source for Public Data, L.P., d/b/a PublicData.com, Shadowsoft, Inc., Harlington-Straker Studio, Inc., and Dale Bruce Stringfellow (collectively, "Defendants"), by counsel and pursuant to Federal Rule of Civil Procedure 12(b)(6), respectfully move this Court to dismiss Plaintiffs' Amended Complaint [Dkt. No. 25] with prejudice. The reasons for this Motion are set forth in the memorandum contemporaneously filed herewith.

WHEREFORE, Defendants respectfully request that the Court enter an order: (1) granting Defendants' Motion; (2) dismissing Plaintiffs' claims for failure to state a claim for relief under Fed. R. Civ. P. 12(b)(6); and (3) granting such further relief as the Court deems appropriate.

**THE SOURCE FOR PUBLIC DATA, L.P., D/B/A
PUBLICDATA.COM, SHADOWSOFT, INC.,
HARLINGTON-STRAKER STUDIO, INC., AND
DALE BRUCE STRINGFELLOW**

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of September 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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